

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

REBECCA BRAZZANO,

Plaintiff,

v.

THOMPSON HINE LLP, RICHARD  
ANTHONY DE PALMA (in his individual and  
professional capacities), DEBORAH ZIDER  
READ (in her individual and professional  
capacities), and THOMAS LAWRENCE FEHER  
(in his individual and professional capacities),

Defendants.

Index No.: 24-cv-01420 (ALC)(KHP)

**NOTICE OF MOTION TO COMPEL  
ARBITRATION AND FOR A STAY  
PENDING ARBITRATION**

PLEASE TAKE NOTICE that upon the accompanying Memorandum and Declaration of Carolyn J. Fairless, the undersigned counsel for Defendants Thompson Hine LLP, Richard De Palma, Deborah Read and Thomas Feher (“Defendants”) will move this Court at a date and time convenient to the Court for an Order pursuant to the Federal Arbitration Act, 9 U.S.C. § 1 *et seq.*, granting Defendants’ motion to compel arbitration and for a stay pending arbitration, and for such other and further relief as the Court deems just and proper.

Dated: July 12, 2024

Respectfully submitted,

*s/ Carolyn J. Fairless*

---

Carolyn J. Fairless (Admitted *pro hac vice*)

Wheeler Trigg O'Donnell LLP

370 Seventeenth Street, Suite 4500

Denver, CO 80202

Telephone: 303-244-1852

Email: fairless@wtotrial.com

*Attorney for Defendants*

**CERTIFICATE OF SERVICE (CM/ECF)**

I hereby certify that on July 12, 2024, I caused the foregoing *Notice of Motion to Compel Arbitration and for a Stay Pending Arbitration* to be filed electronically with the Clerk of Court, which is deemed served upon all counsel of record via the Court's CM/ECF system.

s/ Carolyn J. Fairless